



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

02-OSR-0597

Mr. R. F. Naventi, Project Manager
Bechtel National, Inc.
2435 Stevens Center
Richland, Washington 99352

Dear Mr. Naventi:

**CONTRACT NO. DE-AC27-01RV14136 – PARTIAL ACCEPTANCE OF BECHTEL
NATIONAL, INC.'S (BNI) RESPONSE TO CONFIGURATION MANAGEMENT
INSPECTION REPORT IR-02-007 FINDINGS**

- References:
1. ORP letter from R. C. Barr to R. F. Naventi, BNI, "Inspection Report IR-02-007-Configuration Management Inspection," 02-OSR-0270, dated July 8, 2002.
 2. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Bechtel National, Inc.'s Response to Inspection Report IR-02-007 – Configuration Management Inspection," CCN-038148, dated August 29, 2002.
 3. ORP letter from R. J. Schepens to R. F. Naventi, BNI, "Response to Findings of Configuration Management Inspection Report, IR-02-007," 02-OSR-0466, dated September 24, 2002.
 4. BNI letter from R. F. Naventi to R. J. Schepens, ORP, "Hanford Tank Waste Treatment and Immobilization Plant-Construction Authorization Readiness in Consideration of Recent Assessments and Inspection of Engineering Activities," CCN 042775, dated October 30, 2002.

This letter partially accepts BNI's revised responses and the corrective actions submitted in Reference 4, addressing the Findings documented in Inspection Report IR-02-007, Configuration Management Inspection. The inspection report was provided in Reference 1. BNI's initial responses to the Findings were submitted in Reference 2 and the U.S. Department of Energy, Office of River Protection (ORP) rejected those responses in Reference 3.

During the ORP High Level Waste/Low Activity Waste Construction Authorization Readiness inspection, the inspectors verified implementation of the corrective actions described in Reference 4. The inspector's verification found the revised BNI responses deficient in the following areas:

1. Finding IR-02-007-02-FIN –The revised response committed to "review and revise PDC procedures for inclusion of the use of document data entry processing and compliance checklist as appropriate." This commitment did not address the lack of formal procedure or instruction for entering data into the configuration management (CM) database. The revised response should clearly commit to establish a procedurally controlled process for identifying, entering, and correcting data affecting the CM database.
2. Finding IR-02-007-03 a, b, c-FIN – The revised response provided in Attachment 3 to Reference 4 described BNI's extent-of-condition review. The review consisted of 100% review of electrical discipline Field Change Requests (FCR) and 25% review of civil, structural and architectural discipline FCRs. The extent-of-condition statement did not address FCRs generated by the other engineering disciplines. The revised response should increase the scope of the extent-of-condition review to all engineering disciplines that have used the FCR process.

BNI is requested to provide a revised response which addresses the above comments within 15 days of receipt of this letter. If you have any questions, please contact me, or your staff may contact Pat Carier, WTP Safety Regulation Division, (509) 376-3574.

Sincerely,

OSR:JEA

Roy J. Schepens
Manager

cc: W. R. Spezialetti, BNI